



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

December 20, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.  
de maximis, inc.  
186 Center Street, Suite 290  
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –  
Administrative Settlement Agreement and Order on Consent for Remedial  
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Parties Group's (CPG) *draft Remedial Investigation (RI) Report Appendix N*, prepared by Anchor QEA in January 2018 and provided comments on July 30, 2018. The *revised Appendix N*, was received from the CPG on October 23, 2018 and the CPG's responses to EPA's comments were received on October 22, 2018. EPA has reviewed the *revised Appendix N* and has five remaining comment evaluations. Partner agency comments are incorporated. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report *Appendix N* with this letter.

Please proceed with revisions to the draft RI Report consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager  
Lower Passaic River Study Area RI/FS  
Enclosure

Cc: Zizila, F. (EPA)  
Sivak, M. (EPA)  
Hyatt, B. (CPG)  
Potter, W. (CPG)

**EPA COMMENTS – DECEMBER 2018**

**LPRSA RI/FS, Remedial Investigation Report, Revised Draft Appendix N, dated October 2018**

| <b>No.</b> | <b>Section</b>                  | <b>General or Specific</b> | <b>Page No.</b> | <b>Comment</b>  |
|------------|---------------------------------|----------------------------|-----------------|---|
| 1          | Section 2.6                     | Specific                   | 12              | Section 2.6 was added to Appendix N in response to prior comment #127. The phrase “time chunk” is used several times in this section. This terminology is not clear. Revise the description to be consistent with Appendix M, which states “Both models are run for discrete time periods which range from as much as 30 days (more typically 15 days) during low to average flow conditions to as little as 1 day during high-flow conditions”. In addition, in the second sentence of this section, clarify what the word “exposure” means.       |
| 2          | Section 3.2, second paragraph   | Specific                   | 15              | Per prior comment #130, replace “HQI” with “ST-SWEM” in the first sentence of this paragraph.   |
| 3          | Section 5.4.3, fourth paragraph | Specific                   | 31              | Prior comment #144 regarding macro-organic matter was related to the Weston (2004) reference. The sentence that has been added to the end of this paragraph and references macro-organic matter does not make this clear. The intent of the prior comment was to clarify that the initial estimate of $f_{OC}$ on fines was likely over-estimated rather than the final value being underestimated. Revise the text to recognize that the initial estimate of $f_{OC}$ on fines is likely the cause of the observed change in that value over time. |
| 4          | Figure 2                        | Specific                   | N/A             | Per prior comment #130, delete “HQI” from the figure legend.  |
| 5          | Figures 35 and 36               | Specific                   | N/A             | Guide lines were added to these figures in response to prior comment #149. Check that the guide lines added are correct in the final version, as some appear to be shifted in the revised draft version reviewed (i.e., it appears the guide lines were pasted over the figures and may be shifted relative to the axes).   |

N/A – Not applicable